

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Chapter 13
Andrew J Simkiw	:	
Maria Simkiw	:	
	:	Case No.: 20-12331-AMC
Debtor(s)	:	

MOTION TO APPROVE POST CONFIRMATION DISTRIBUTION

The Debtors through their undersigned Counsel humbly request that this Honorable Court grant the Debtor's Motion to Approve Post Confirmation Distribution and avers the following.

1. Debtors filed a Bankruptcy Petition under Chapter 13 of the Bankruptcy Code on May 18, 2020.
2. Debtors' Chapter 13 Plan was confirmed on October 06, 2020.
3. Debtors' Chapter 13 Plan provided for 0% distribution to unsecured creditors.
4. Debtors are in month 50 of the proposed 60-month length of their plan.
5. Debtor suffered a personal injury because of which he filed an action in the Court of Common Pleas of Montgomery County; Maria and Andrew Simkiw v. Donna Marie Angotti, M.D., et al, CP 2019-24362.
6. Debtors' personal injury action has tentatively been settled in the amount of one million dollars (\$1,000,000.00). The settlement has been split into two distributions of five hundred thousand dollars (\$500,000), with one payment ready to be paid immediately and one payment to be paid in January, minus attorney fees and costs.
7. The following fees and costs are owed by debtor from the personal injury action from the first distribution:

a.	Kline & Specter, P.C., Legal Costs and Expenses	\$65,529.35
b.	Kline & Specter, P.C., Attorney Fees	\$173,788.26

c. Pennsylvania DHS lien repayment \$26,565.39

8. The total costs and attorney fees owed by the debtor from the personal injury action from the second distribution are still being determined. The following will be paid from the distribution:

a. Liberty Funding LLC Litigation Loan repayment \$85,754.25

9. Debtors' net distribution from the personal injury action is estimated to be \$234,117 from the first settlement and \$500,000 minus fees and costs from the second settlement.

10. Non-priority unsecured claims total approximately \$105,582.00.

11. Debtors propose paying all timely filed unsecured non-priority claims at 100%.

WHEREFORE, Debtors respectfully requests that their Motion to Approve Post Confirmation Distribution be granted.

Dated: July 31, 2024

/s/ Brad J. Sadek

Brad J. Sadek, Esquire
Sadek Law Offices
1500 JFK Boulevard, Suite 220
Philadelphia, PA 19102
(215) 545-0008
brad@sadeklaw.com

Counsel to the Debtors